

Exhibit 1

From: Carey Miller
Sent: Wednesday, August 26, 2020 10:14 PM
To: Cross, David D.; Jonathan Crumly; Conaway, Jenna B.; Miriyala, Arvind S.; ram@lawram.com; cichter@ichterdavis.com; Hedgecock, Lyle F.; Bryan Tyson; Josh Belinfante; Vincent Russo; Alexander Denton; kaye.burwell@fultoncountyga.gov; cheryl.ringer@fultoncountyga.gov; david.lowman@fultoncountyga.gov; Loree Anne Paradise; Diane LaRoss; Bryan Jacoutot
Cc: Kim Bunch
Subject: Curling v Raffensperger -- State Defendants' Expedited Production

Counsel,

Please find at the link below documents responsive to the joint expedited discovery requests and Coalition expedited discovery requests as revised in scope by the Court (Doc. 799). Defendants understand the Court has overruled our objections to the request and thus no documents are being withheld on the basis of those objections, except as mentioned below.

For the Coalition request 3, as modified by the Court Order, no responsive documents were located. For Coalition Request 2(b), responsive documents have not yet been located during the expedited search. Defendants are continuing to search for documents responsive to this request and will provide them as soon as they are available, but no later than Friday August 28, 2020.

For the Joint requests, no responsive documents were identified for Request 14 and this request was dealt with separately by the Court. State Defendants are withholding one responsive document to Request No. 9 because it is protected as Attorney Work Product. For request 10, please see the declaration of David Hamilton at [Doc. 819].

Finally, as we mentioned previously, we will produce additional documents tomorrow by noon which were overlooked due to the technical error uploading to our review platform.

<https://www.dropbox.com/sh/bj6daIn6o0d4lf0/AABId0G8XDxGgNuOG0-6dppqa?dl=0>

Password: @Z*3Q(nP%3gT2!!

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